



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

N60087.AR.001469
NAS BRUNSWICK
5090.3a

JOHN ELIAS BALDACCI
GOVERNOR

DAWN R. GALLAGHER
COMMISSIONER

June 6, 2005

Mr. Orlando Monaco
Department of Navy
Engineering Field Activity-Northeast
Code 1823/OM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Sites 1, 3 and Eastern Plume Monitoring Event 24-April 2004 Response to Comments
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Response to Comments (RTC) dated March 21, 2005, for Sites 1, 3 and the Eastern Plume Monitoring Event 24-April 2004, prepared by Environmental Chemical Corporation. Based on the review of the RTC MEDEP has the remaining comments and issues.

Comment 4: Regarding the continued use of MW-217B for sampling, MEDEP believes that given the recent year history of pumping this well dry during sampling that it is time to solidify plans to deepen or replace this well. It is a very key monitoring point and the risk of compromising the analytical samples should be eliminated as soon as possible. (RR)

Comment 9: The Navy's proposal is acceptable, provided sufficient detail is included. (ED)

Comment 12: Both the MEDEP's original comment and the Navy's response appear to be outdated by newer insights presented by MEDEP at the April 2005 technical meeting in Brunswick. The cleaning up of groundwater samples taken at MW-207AR and MW-319, addressed in the original comment, is now believed by MEDEP to be due to the arrival of a narrow plume of treatment plant effluent discharged into the infiltration gallery at the location of the former FTA, a major source of the Eastern Plume contamination. (NR)

The Navy's plan to measure and track the artesian flow at MW-207AR for future monitoring events is encouraged. The means of accomplishing this task needs to be provided. (RR)

Comment 17: The Navy's proposed changes are accepted, providing that a footnote is added to each Appendix C graph where 1,4 dioxane was documented to occur. The footnote should state that "1,4 dioxane is not included in the total VOC value. See Table B-3." (ED)

Comment 20: The Navy's proposed action is appropriate. Please add dates and pumping rates that document substantial operational changes to EW-04 during the ME-24 time interval. (ED)

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 764-1507

Comment 27.b: The response to 27.b. is not convincing. MEDEP stands by its original comment that MW-1104 water samples should not be called non-impacted upgradient groundwater. (RR)

Comment 28: The Navy's response is acceptable, however one comment was made that was not addressed. A response for the following is needed: "Also, not all the elevated methane concentrations shown in Figure 13C have been included in the isocontouring. Most notable are three wells (MW-303, MW-335, and MW-338A) located hundreds of feet beyond the leading edge of the mapped plume." (RR)

Comment 30: MEDEP needs to see the results of the updating of Table 17 and Figure 14, to verify that appropriate changes have been made. (ED)

Comment 33: The Navy's response is interpreted as indicating that the sentence in question presents an alternative hypothesis that most likely is not satisfied by conditions at the Eastern Plume. The value of including this sentence in the report is questionable. Please either delete the sentence or add that it is a generally accepted alternative explanation that currently lacks supporting evidence at the Eastern Plume. (ED)

Comment 36: The Navy's response indicates that more information will be provided in a later report. While this is anticipated with interest, it does not solve the concerns named within MEDEP's comment. The report statement in question would be acceptable with respect to MEDEP's response to Comment 33 (above) if edited as follows: "While these data are not definitive, they indicate that a few localities within the deep zone of the Eastern Plume associated with natural organic carbon appear to have conditions which are favorable for complete reductive dechlorination." (ED)

Comment 38: The Navy's stated intentions are appropriate. As stated in Comment 30, the revised Figure 14 must be forwarded for our review prior to accepting the ME-24 report.

If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,



Claudia Sait
Project Manager-Federal Facilities
Bureau of Remediation & Waste Management

Cf: File
Chris Evans-MEDEP
Lisa Joy-BNAS
Christine Williams-EPA
Carolyn Lepage-Lepage Environmental
Gina Calderone-EA (email only)
Darren Gainer -ECC
Ed Benedikt